

EXHIBIT “A”

FILED: NEW YORK COUNTY CLERK 04/07/2022 12:54 PM

INDEX NO. 153003/2022

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 04/07/2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK-----X
JANEMARIE INGHAM,

Plaintiff,

- against -

TARGET CORPORATION,

Defendant.
-----X

Filed: _____

Index No.: _____

SUMMONSPlaintiff designates NEW
YORK County as the place
of trial.Basis of venue is Target
Corporation's Principal
Office in New York:
521 West 25th Street,
New York, New York 10001

To the above-named Defendant:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney (s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Jericho, New York
April 7, 2022_____
John R. Danzi, Esq.
LAW OFFICE OF ROBERT F. DANZI
Attorneys for Plaintiff
500 North Broadway, Suite 124
Jericho, New York 11753
(516) 228-4226

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TO: TARGET CORPORATION
c/o Secretary of State
One Commerce Plaza
99 Washington Avenue
Albany, New York 12231

TARGET CORPORATION
1000 Nicollet Mall
Minneapolis, Minnesota 55403

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JANEMARIE INGHAM,

Index No.: _____

Plaintiff,

VERIFIED COMPLAINT

- against -

TARGET CORPORATION,

Defendant.

-----X

JANEMARIE INGHAM, by her attorneys, the LAW OFFICE OF ROBERT F. DANZI,
for her Verified Complaint, respectfully alleges upon information and belief:

1. At all times herein, plaintiff, JANEMARIE INGHAM was and still is a resident of
the County of Nassau, State of New York.

2. Upon information and belief and at all times herein, defendant, TARGET
CORPORATION, is a foreign business corporation duly organized and existing under the laws
of the State of New York.

3. Upon information and belief and at all times herein, defendant, TARGET
CORPORATION'S principal office is located at 521 West 25th Street, New York, New York.

AS AND FOR A FIRST CAUSE OF ACTION

4. Upon information and belief and at all times herein, defendant, TARGET
CORPORATION is the owner of real property located at 999 Corporate Drive, Westbury, New
York 11590 (hereinafter the "premises").

5. Upon information and belief and at all times herein, defendant, TARGET
CORPORATION is the lessee of real property located at 999 Corporate Drive, Westbury, New
York 11590 (hereinafter the "premises").

6. Upon information and belief and at all times herein, defendant, TARGET CORPORATION, was the owner of said premises on or about November 1, 2021.

7. Upon information and belief and at all times herein, defendant, TARGET CORPORATION, was the lessee of said premises on or about November 1, 2021.

8. Upon information and belief, on or about November 1, 2021, defendant, TARGET CORPORATION, controlled the floor that existed on said premises.

9. Upon information and belief, on or about November 1, 2021, defendant, TARGET CORPORATION, was responsible for the maintenance of the floor that existed on said premises.

10. Upon information and belief, on or about November 1, 2021, defendant, TARGET CORPORATION, was responsible for the operation of the floor that existed on said premises.

11. Upon information and belief, on or about November 1, 2021, defendant, TARGET CORPORATION, was responsible for the supervision of the floor that existed on said premises.

12. On or about November 1, 2021, plaintiff, JANEMARIE INGHAM, was lawfully on the premises.

13. Upon information and belief, on or about November 1, 2021, defendant, TARGET CORPORATION was responsible for the condition of the floor that existed on said premises.

14. Upon information and belief, on or about November 1, 2021, defendant, TARGET CORPORATION was responsible for the supervision of the floor that existed on said premises.

15. On or about November 1, 2021, defendant, TARGET CORPORATION had actual notice that a dangerous condition existed on the floor of said premises.

16. On or about November 1, 2021, defendant, TARGET CORPORATION was on constructive notice of a dangerous condition that existed on the floor of said premises.

17. On or about November 1, 2021, plaintiff, JANEMARIE INGHAM, attempted to traverse the floor on said premises.

18. At the time and place as aforesaid, plaintiff, JANEMARIE INGHAM, was caused to fall due to a defective, dangerous, and treacherous condition then and there existing on the floor on said premises.

19. At the time and place as aforesaid, plaintiff, JANEMARIE INGHAM, was caused to become severely injured due to the defective, dangerous, and treacherous condition of the floor on said premises.

20. Upon information and belief, plaintiff, JANEMARIE INGHAM's incident and the resulting injuries were due to defendant, TARGET CORPORATION's negligent maintenance of the floor on said premises.

21. Upon information and belief, plaintiff, JANEMARIE INGHAM's incident and the resulting injuries were due to defendant, TARGET CORPORATION's negligent control of the floor on said premises.

22. Upon information and belief, plaintiff, JANEMARIE INGHAM's incident and the resulting injuries were due to defendant, TARGET CORPORATION's negligent condition of the floor on said premises.

23. Upon information and belief, plaintiff, JANEMARIE INGHAM's incident and the resulting injuries were due to defendant, TARGET CORPORATION's negligent supervision of the floor on said premises.

24. Upon information and belief, defendant, TARGET CORPORATION was negligent in the ownership, operation, maintenance, supervision and control of the floor on said premises by negligently, carelessly and recklessly permitting, causing and/or allowing the floor to be unfit for the traversing of its patrons.

25. Upon information and belief, defendant, TARGET CORPORATION was negligent in the leasing, operation, maintenance, supervision and control of the floor on said premises by negligently, carelessly and recklessly permitting, causing and/or allowing the floor to be unfit for the traversing of its patrons.

26. Upon information and belief, defendant, TARGET CORPORATION was negligent in the ownership, operation, maintenance, supervision and control of the floor on said premises by negligently, carelessly and recklessly permitting, causing and/or allowing the floor to be improperly maintained.

27. Upon information and belief, defendant, TARGET CORPORATION was negligent in the leasing, operation, maintenance, supervision and control of the floor on said premises by negligently, carelessly and recklessly permitting, causing and/or allowing the floor to be improperly maintained.

28. As a result of the foregoing and by reason of the negligence of defendant, TARGET CORPORATION, plaintiff, JANEMARIE INGHAM, was caused to become severely and permanently injured, requiring medical care and treatment.

29. Upon information and belief, plaintiff, JANEMARIE INGHAM's incident and the resulting injuries were due to defendant, TARGET CORPORATION's negligent maintenance of the floor on said premises.

30. Upon information and belief, plaintiff, JANEMARIE INGHAM's incident and the resulting injuries were due to defendant, TARGET CORPORATION's negligent control of the floor on said premises.

31. Upon information and belief, plaintiff, JANEMARIE INGHAM's incident and the resulting injuries were due to defendant, TARGET CORPORATION's negligent condition of the floor on said premises.


32. Upon information and belief, plaintiff, JANEMARIE INGHAM's incident and the resulting injuries were due to defendant, TARGET CORPORATION's negligent supervision of the floor on said premises.

33. As a result of the foregoing and by reason of the negligence of defendant, TARGET CORPORATION, plaintiff, JANEMARIE INGHAM, was caused to become severely and permanently injured, requiring medical care and treatment.

34. By reason of the foregoing, plaintiff has been damaged in an amount that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction of this action.

WHEREFORE, plaintiff demands judgment against the defendants on all causes of action in sums which exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction and for such other relief as this court may deem just and proper.

Dated: Jericho, New York
April 7, 2022



John R. Danzi, Esq.
LAW OFFICE OF ROBERT F. DANZI
Attorneys for Plaintiff
500 North Broadway, Suite 124
Jericho, New York 11753
(516) 228-4226

VERIFICATION

STATE OF NEW YORK }
 } SS.:
COUNTY OF NASSAU)

Janemarie Ingham, being duly sworn, deposes and says:

I have read the foregoing

Complaint

and know the contents thereof; it is true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters, I believe them to be true.

Janemarie Ingham

Sworn to before me this
7th day of April, 2022

Luisa Gil
Notary Public

LUISA GIL
NOTARY PUBLIC-STATE OF NEW YORK
No. 01GI6412798
Qualified in Suffolk County
My Commission Expires 01-11-2025

INDEX NO.:
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANEMARIE INGHAM,

Plaintiff,

- against -

TARGET CORPORATION,

Defendant.

SUMMONS and VERIFIED COMPLAINT

Law Office of Robert F. Danzi
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500 North Broadway, Suite 124
Jericho, New York 11753
T: (516) 228-4226
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